

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
(EASTERN DIVISION)**

<b>In re:</b>	§	<b>Case No. 16-13704</b>
	§	
<b>COSI, INC., et al.,</b>	§	<b>(Chapter 11)</b>
	§	
<b>Debtors.<sup>1</sup></b>	§	<b>Jointly Administered</b>
	§	

**MOTION FOR LEAVE TO APPEAR TELEPHONICALLY  
AT HEARING SCHEDULED FOR APRIL 25, 2017 AT 10:00 A.M.**

COMES NOW counsel for the AB Opportunity Fund LLC (“AB Opportunity”), AB Value Partners, L.P. (“AB Value,” together with AB Opportunity the “AB Funds”) and one or more entities affiliated with MILFAM II L.P. (“Milfam,” and together with the AB Funds, collectively, in their capacities as existing prepetition lenders to the Debtors, the “Existing Lenders,” and hereby moves this Court to grant leave to Katherine Drell Grissel (“Counsel”) of Vinson & Elkins (“Vinson & Elkins”) to appear telephonically at the hearing scheduled for April 25, 2017.

1. The Court has scheduled a hearing to consider confirmation of the Joint Plan of Reorganization for April 25, 2017 at 10:00 a.m. in Boston, Massachusetts (the “Plan Confirmation Hearing”).

2. Pursuant to Local Rule 9074-1, the Existing Lenders respectfully request that Counsel Grissel, be permitted to appear telephonically for the Plan Confirmation Hearing as, due to physical limitations resulting in the inability to travel, she is not able to travel from Dallas to Boston for the hearing.

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<sup>1</sup> The Debtors in these chapter 11 cases are Cosi, Inc. (16-13704-MSH), Xando Cosi of Maryland, Inc. (Case No. 16-13706-MSH), Cosi Sandwich Bar, Inc. (Case No. 16-13705-MSH), Hearthstone Associates, LLC (Case No. 16-13707-MSH), and Hearthstone Partners, LLC (16-13708-MSH). The Debtors’ corporate offices are located at 294 Washington Street, Suite 510, Boston, Massachusetts 02108. The cases are jointly administered under the Cosi, Inc. case number.

WHEREFORE, Counsel Grissel, on behalf of the Existing Lenders, respectfully requests the right to appear telephonically at the hearing on April 25, 2017.

Dated: April 12, 2017  
Boston, Massachusetts

**BROWN RUDNICK LLP**

By: /s/ William R. Baldiga  
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**CO-COUNSEL FOR THE EXISTING  
LENDERS**

**CERTIFICATE OF SERVICE**

The undersigned certifies that on April 12, 2017, the foregoing Motion was filed electronically, and therefore was sent by email to those receiving CM/ECF notices from the Court's electronic filing system. I further certify that I have caused a copy to be mailed electronically and also by first class U.S mail, to the following parties on this 12th day of April, 2017.

Joseph H. Baldiga, Esq.  
Paul W. Carey, Esq.  
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and

Paula R.C. Bachtell, Esq.  
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/s/ William R. Baldiga  
William R. Baldiga